

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA**

THE DELOACH GROUP, INC. d/b/a, Quastar
Computer International,

Plaintiff,

vs.

ASHFORD FINANCE, LLC, NOUSHIR HASAN,
CARREFOUR INFORMATIQUE TREMBLANT,
INC., CORPORATE FUNDING PARTNERS,
LLC D/B/A GANGES EXPORTS USA,
LC.COM, LTD., MARSHALL JABLON, MIKE
TONES, AMIN HAQ, BEEM KHEMANEY.

Defendants.

CASE NO. 1:11-cv-01678-LMM

**NOTICE OF WITHDRAWAL AS COUNSEL OF RECORD FOR
DEFENDANTS ASHFORD FINANCE, LLC AND NOUSHIR HASAN'S
ON BEHALF OF MARY B. CLARK, ESQ.**

PLEASE TAKE NOTICE that Mary B. Clark, Esq. (who was previously admitted *pro hac vice* in this matter; Doc. #38) is no longer associated with the law firm of Greenspoon Marder, P.A. and, consequently, is no longer counsel for Defendants Ashford Finance, LLC and Noushir Hasan ("Defendants"). Thus, Defendants hereby give notice of Ms. Clark's withdrawal as their counsel, and further state as follows:

1. Defendants Ashford Finance, LLC and Noushir Hasan are represented and will continue to be represented in this matter by the following attorneys of record: Marvin P. Pastel, II, Esq. of the law firm Winter Capriola Zenner, LLC (local Georgia counsel who made his first appearance on May 23, 2011 when the Notice of Removal was filed); Richard W. Epstein, Esq. of the Florida law firm Greenspoon Marder, P.A. admitted *pro hac vice* on June 13, 2011; Rebecca F. Bratter, Esq. of the Florida law firm Greenspoon Marder, P.A. admitted *pro hac vice* on June 13, 2011; and Meredith H. Leonard, Esq. of the Florida law firm Greenspoon Marder, P.A. admitted *pro hac vice* on March 14, 2014.

2. Accordingly, Ms. Clark's withdrawal as counsel will not result in a material adverse effect (nor any effect whatsoever) on Defendants' current representation in this matter.

3. Copies of all further papers and proceedings herein, except original process, shall continue to be served upon the remaining attorneys of record for Defendants Ashford Finance, LLC and Noushir Hasan.

4. Ms. Clark's withdrawal as counsel of record is effective immediately.

Respectfully submitted this 12th day of February, 2015.

Respectfully submitted,

s/Richard W. Epstein

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 12th day of February, 2015, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record by transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

s/Richard W. Epstein

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